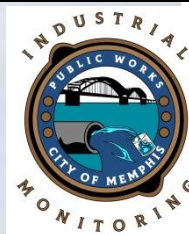


IMPP Newsletter



Volume 1, Issue 1

January 2021

Introduction of the Newsletter

Improving communication with Industrial Users is a major goal for the Industrial Monitoring and Pretreatment Program (IMPP). The newsletter may evolve over time, but its purpose is to notify you of key dates, tips for compliance, IMPP staffing information, treatment plant information, and many more topics.

Inside This Issue

1. Introduction, IMPP Staff, Key Dates
2. City's Publicly Owned Treatment Works, Employee Spotlight, IMPP Information
3. How to Avoid Violations, Tips, Program Projects, Q&A

KEY DATES

Monthly

January 15th – December SMR Due
February 15th – January SMR Due
March 15th – February SMR Due
April 15th: March SMR Due
May 15th: April SMR Due
June 15th: May SMR Due
July 15th – June SMR Due
August 15th – July SMR Due
September 15th – August SMR Due
October 15th – September SMR Due
November 15th – October SMR Due
December 15th – November SMR Due

Semi-Annual

June 1st – 1st Semi-Annual Report Due
Sample Date between (11/1/2020 – 4/30/2021)
December 1st – 2nd Semi-Annual Report Due
Sample Date between (5/1/2021 – 11/30/2021)

Annual

June 30th: Flowmeter Calibration Reports

IMPP Staff

Program Manager: Interim

Derrick Porter

Desk:(901) 636-4336, Cell:(901) 574-8034

Derrick.Porter@memphistn.gov

Office Support Staff:

Rickena Patterson

(901) 636-4306

Rickena.Patterson@memphistn.gov

Environmental Technical Manager:

Derek Willis

Desk:(901) 636-4338, Cell:(901) 293-1873

Derek.Willis@memphistn.gov

Environmental Engineer:

Parker Stone P.E.

Desk:(901) 636-4344, Cell:(901) 201-0379

Parker.Stone@memphistn.gov

Database Analyst:

Kim Curan-Butler

(901) 636-4328

Kim.Curan@memphistn.gov

Environmental Compliance Supervisor:

Theresa Stein

Desk:(901) 636-4364, Cell:(901) 355-1432

Theresa.Stein@memphistn.gov

Environmental Coordinators(s):

Darryl Brady

(901) 636-4342

Darryl.Brady@memphistn.gov

Brandon Griffin

(901) 636-4303

Brandon.Griffin@memphistn.gov

Anthony Folsen

(901) 636-4362

Anthony.Folsen@memphistn.gov

Stiles Plant Operations: (901) 636-4300

Maxson Plant Operations: (901) 789-0510

City's Publicly Owned Treatment Works (POTW)

Wastewater Treatment Plants

The City of Memphis constructed the first segments of the Collection System (Sewers) in the late 1800's, to help reduce the yellow fever epidemics. This separated the sanitary sewer (wastewater) from the storm sewer (storm water runoff), and included approximately 50 miles of sewer lines. Over time as the City expanded, so did the collection system. To date the City owns approximately 2,800 miles of sewer lines. In 2012, the City negotiated a Consent Decree with U.S. EPA and TDEC to assess and rehabilitate the collection system. The City is estimated to spend \$250 million over 10 years through the SARP10 Program.

M.C. Stiles Plant (North) & T.E. Maxson Plant (South)

The collection system discharged directly into the Mississippi until the completion of the City's wastewater treatment plants (WWTP). The Maxson Plant became operational in 1975 and Stiles Plant became operational in 1977. More to come on the WWTPs in the next edition of the IMPP Newsletter.

To determine which wastewater plant you discharge to, look at your permit number. The first character in the permit number is either "S" or "N". "S" means you discharge to the South (Maxson) WWTP and "N" means you discharge to the North (Stiles) WWTP. A good rule of thumb is if you are north of Poplar Avenue, you discharge to the North Plant. If you are south of Poplar Avenue, you discharge to the South Plant.

Employee Spotlight

New Employees

Environmental Coordinator: Anthony Folsen

Anthony was hired in February 2020. He previously worked as a Laboratory Analyst at the M.C. Stiles Wastewater Treatment Facility. Anthony was nominated for the Shining Star Award in 2020.

Environmental Technical Manager: Derek Willis

Derek was hired in September 2019 as an Environmental Compliance Supervisor and is now the Environmental Technical Manager. Derek has over 15 years' experience in Environmental Remediation, Compliance and Enforcement, Management, Storm Water, and SARP10.

Environmental Compliance Supervisor: Theresa Stein

Theresa was hired in August 2019. She has a Level 4 Wastewater Operators license and previously worked as a Wastewater Operator for the M.C. Stiles Wastewater Treatment Facility. Theresa received the Shining Star Award by the City of Memphis for her work performance in 2020.

Each of the employees in the Pretreatment Program was nominated for a Shining Star Award for 2020 and the Department was nominated for a Team Award in 2020.

CITY OF MEMPHIS IMPP INFORMATION

Number of Staff: 9

Number of Permitted Industrial Users: 102

Largest Pretreatment Program in TN (based on number of Industries)

Largest Pretreatment Program in EPA Region 4 (AL, FL, GA, KY, MS, NC, SC, TN)

18th Largest Pretreatment Program in the Nation (out of ~1,500)

In 2019, IMPP collected and analyzed ~7,000 samples

In 2019, Industries collected and analyzed ~97,000 samples

HOW TO AVOID PERMIT VIOLATIONS

REPORTING TIPS

- Submit reports completed and on time.
 - o Monthly reports are due on the 15th of each month
 - o Semi-annual reports are due June 1st & December 1st
 - o Flowmeter Calibration reports are due June 30th
- Sign reports by Authorized Representative with proper certification statement (i.e., "I certify under penalty of law...")

PARAMETER COMPLIANCE

- Calibrate pH meter frequently
- Calibrate flow meter frequently (at least annually)
- Sample early in the month if you have monthly average limits
- Use detection limits at or below the permit limits to show compliance

Q & A

We would like to ensure than any question you have is answered. Odds are, if you have a question about something Pretreatment-related, other Industry representatives do also. The next edition of the Newsletter will include some Q&As. Please send any questions that you would like to have answered to Kim Curan: kim.curan@memphistn.gov



TIPS

Did you know that your permit, the sewer use ordinance, and the federal pretreatment regulations require Industrial Users to report discharge violations to our office within 24 hours of becoming aware of the violations, and resample and submit the results to our office within 30 days of becoming aware? [40 CFR 403.12(g)(2)]

Did you know that the federal regulations at 40 CFR 403.12(g)(3) require that grab sampling techniques be used for the collection of pH, cyanide, total phenols, oil and grease, sulfide, and volatile organic compounds (VOCs)?

Did you know that the federal regulations at 40 CFR 403.5(b) state that wastewater pH less than 5.0 is prohibited to be discharged to the POTW? (Please note that the City's minimum pH limit is 5.5)

Program Projects

Local Limit Evaluation

Every NPDES Plant permit cycle we evaluate local limits. Local limits address the specific needs and concerns of a publicly owned treatment works (POTW), its sludge, and its receiving waters. Most of the general prohibited discharge standards specified at 40 CFR Part 403.5 (PDF) (2 pp, 204 K) are not specific pollutant limitations. As a result, a POTW must evaluate its facility's capabilities and establish local limits to protect it from receiving wastes that pass through or interfere with discharge. Alone or in conjunction with a discharge or discharges from other sources, both (1) inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use, or disposal; and (2) therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with ... [applicable] statutory provisions and regulations or permits issued thereunder (or more stringent state or local regulations). [paraphrased from 40 CFR 403.3(k)] with operations (including sludge management).

The City of Memphis performed its Local Limits sampling events in December 2020 and has partnered with Brown & Caldwell to analyze and calculate parameter limitations. An updated Local Limits evaluation will be implemented in 2021.